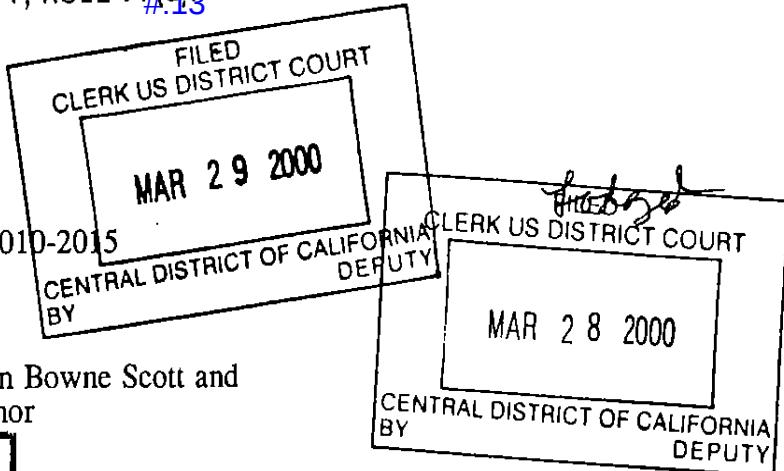
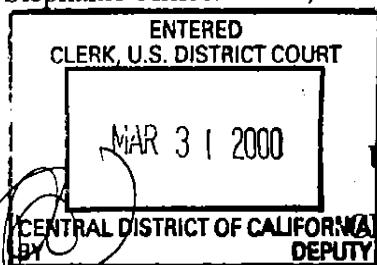


1 HUGH R. MANES
2 MANES & WATSON
3 3435 Wilshire Boulevard
4 Suite 2900
5 Los Angeles, California 90010-2015
6 Telephone: (213) 381-7793



5 Attorneys for plaintiffs Brian Bowne Scott and
6 Stephanie Allison Scott, minor



7 UNITED STATES DISTRICT COURT

8 CENTRAL DISTRICT OF CALIFORNIA

9
10 FRANCES SCOTT, et al.,) CASE NO. CV 93-1319 DT
11 Plaintiffs,) Consolidated with CV 95-6931 DT and
12) CV 93-3830 DT
13 vs.) INTRA - PLAINTIFF AGREEMENT AS TO
14 SHERMAN BLOCK, et al.,) APPORTIONMENT OF SETTLEMENT
15 Defendants.) PROCEEDS AND ORDER

16 Come now plaintiffs FRANCES SCOTT, BRIAN BOWNE SCOTT, STEPHANIE SCOTT,
17 a minor, by her guardian ad litem, Karen Scott, SUSAN SCOTT, DENISE SCOTT, and ESTATE
18 OF DONALD SCOTT, by their respective counsel of record, and represent to the Court that
19 agreement has been reached by, between and among all plaintiffs to apportion the global settlement
20 in the within consolidated cause, as set forth below.

I HEREBY CERTIFY THAT THIS DOCUMENT IS SERVED BY
FIRST CLASS MAIL, POSTAGE PAID, TO ALL
(OF PARTIES) AT THEIR RESPECTIVE, MOST RECENT ADDRESS OF
RECORD, IN THIS ACTION, ON
DATED: MAR 31 2000

21
22 PREAMBLE

23 The global settlement in this case is \$5,000,000.00, one fifth of which is being paid by the
24 defendant UNITED STATES OF AMERICA, and the other four-fifths of which is being paid by
25 the defendant COUNTY OF LOS ANGELES.

26 An equal division of the settlement proceeds among the six plaintiffs in this consolidated
27 action would result in a gross distributive share to each in the sum of \$833,334.

Docketed
Copies / NTC Sent
JS - 5 JS - 6
JS - 2 / JS - 3
CLSD

559
JG

1 However, plaintiffs and their counsel each recognize that the legal work, research and legal
2 services done and performed by the attorneys for plaintiff FRANCES SCOTT significantly exceeds
3 that done by attorneys for the remaining plaintiffs so that an adjustment needs to be made in the
4 distribution to compensate said plaintiff and her attorneys therefor.

5 Accordingly, plaintiff SUSAN SCOTT and DENISE SCOTT agree to yield portions of their
6 respective shares, and attorneys for BRIAN SCOTT and STEPHANIE SCOTT agree to yield a
7 portion of their fees to plaintiff FRANCES SCOTT, which adjustments are reflected in the agreed
8 apportionment and distribution set forth below:

9 1. Plaintiff FRANCES SCOTT to receive the gross sum of \$1,149,833.33, from which
10 gross sum shall be deducted all costs and attorneys fees pursuant to and in accordance with the
11 retainer agreement between said plaintiff and her counsel of record in the within consolidated cause.

12 2. Plaintiff BRIAN BOWNE SCOTT to receive the gross sum of \$791,750.00, from
13 which the following shall be deducted and paid to the law firm of MANES & WATSON, counsel
14 of record for said plaintiff, to wit:

15

20 3. Plaintiff STEPHANIE ALLISON SCOTT to receive the gross sum of \$791,720.00,
21 from which gross sum the following costs and attorneys fees shall be deducted, subject to the
22 approval of the Court:

27 4. Plaintiff DENISE SCOTT, and through her guardian ad litem, Rosalyn Scott, to
28 receive the gross sum of \$725,333.33, from which gross sum costs and attorneys fees shall be

1 deducted and paid to said plaintiff's attorneys of record, to wit: STEINER & SAFFER, pursuant
2 to and in accordance with their retainer agreement;

3 5. Plaintiff SUSAN ALYS SCOTT, to receive the gross sum of \$708,833.34, from
4 which gross sum costs and attorneys fees shall be deducted and paid to said plaintiff's attorneys of
5 record, to wit: LONGO & LONGO, LLP; pursuant to and in accordance with their retainer
6 agreement.

7 6. Plaintiff ESTATE OF DONALD SCOTT is to receive the gross sum of \$833,000.00,
8 from which shall be deducted and paid to said plaintiff's attorneys of record, to wit:
9 SCHONBRUM, DE SIMONE, SEPLOW, HARRIS & HOFFMAN, LLP, costs and attorneys fees
10 pursuant to and in accordance with their retainer agreement.

11 KAREN SCOTT, the guardian ad litem for plaintiff STEPHANIE ALLISON SCOTT
12 is authorized to invest up to eighty percent (80%) of said plaintiff's net settlement share in a 20
13 year life annuity; and the balance to be paid into a blocked interest paying account at a court
14 appointed banking institution until her twenty-first birthday, at which time all funds and annuities
15 shall be turned over to said plaintiff's possession and control.

16 We, the undersigned counsel of record for the above specified plaintiffs herewith
17 agree to and approve the foregoing.

18

19 DATED: March 26, 2000

MANES & WATSON

20 By


21 HUGH R. MANES
22 Attorneys for Brian Bowne Scott
23 and Stephanie Allison Scott

24

DATED: March ___, 2000

COCHRAN, CHERRY, GIVENS,
25 SMITH & FERRER, P.C.

26

By


27 ERIC G. FERRER

28

1 deducted and paid to said plaintiff's attorneys of record, to wit: STEINER & SAFFER, pursuant
2 to and in accordance with their retainer agreement;

3 5. Plaintiff SUSAN ALYS SCOTT, to receive the gross sum of \$706,833.34, from
4 which gross sum costs and attorneys fees shall be deducted and paid to said plaintiff's attorneys of
5 record, to wit: LONGO & LONGO, LLP; pursuant to and in accordance with their retainer
6 agreement.

7 6. Plaintiff ESTATE OF DONALD SCOTT is to receive the gross sum of \$833,000.00.
8 from which shall be deducted and paid to said plaintiff's attorneys of record, to wit:
9 SCHONBRUM, DE SIMONE, SEPLOW, HARRIS & HOFFMAN, LLP, costs and attorneys fees
10 pursuant to and in accordance with their retainer agreement.

11 KAREN SCOTT, the guardian ad litem for plaintiff STEPHANIE ALLISON SCOTT
12 is authorized to invest up to eighty percent (80%) of said plaintiff's net settlement share in a 20
13 year life annuity; and the balance to be paid into a blocked interest paying account at a court
14 appointed banking institution until her twenty-first birthday, at which time all funds and annuities
15 shall be turned over to said plaintiff's possession and control.

16 We, the undersigned counsel of record for the above specified plaintiffs herewith
17 agree to and approve the foregoing.

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19 DATED: March 27, 2000

MANES & WATSON

20 By

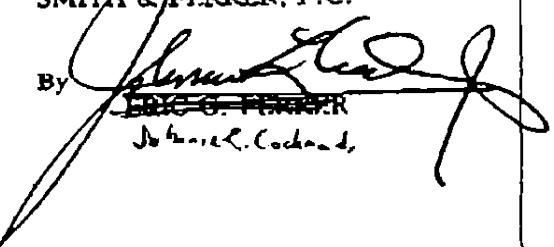

HUGH R. MANES
Attorneys for Brian Bowne Scott
and Stephanie Allison Scott

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22 DATED: March 27, 2000

COCHRAN, CHERRY, GIVENS,
SMITH & FERRER, P.C.

23 By


JOHN C. COCHRAN,
John C. Cochran,

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STEINER & SAFFER

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1 DATED: March 28, 2000

STEINER & SAFFER

2 By

3 DAVID P. STEINER
4 Attorney for Plaintiff Donald Scott5 DATED: March 28, 2000

6 SCHONBRUN & DE SIMONE

7 By

8 MICHAEL SIELOW
9 Attorney for Estate of
10 Donald Scott11 DATED: March 28, 2000

12 LONGO & LONGO, LLP

13 By

14 FRANK J. LONGO
15 Attorney for Plaintiff
16 Susan Alyse Scott

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1 DATED: March ___, 2000

STEINER & SAFFER

2

3 By

DAVID P. STEINER
Attorneys for Plaintiff Denise Scott

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5 DATED: March 29, 2000

SCHONBRUN & DE SIMONE

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10 DATED: March ___, 2000

LONGO & LONGO, LLP

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By

FRANK J. LONGO
Attorneys for Plaintiff
Susan Alys Scott

1 DATED: March ____, 2000

STEINER & SAFFER

2

By

DAVID P. STEINER
Attorneys for Plaintiff Denise Scott

3

4 DATED: March ____, 2000

SCHONBRUN & DE SIMONE

5

6

By

MICHAEL SEPLOW
Attorneys for Estate of
Donald Scott

7

8

9 DATED: March 28, 2000

10 LONGO & LONGO, LLP

11

By

12 FRANK J. LONGO
13 Attorneys for Plaintiff
14 Susan Alys Scott

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1 ORDER RE DISTRIBUTION OF SETTLEMENT PROCEEDS
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3 The Court, having read the attached Intra-Plaintiff Agreement apportioning the proceeds of
4 the global settlement proceeds being in the sum of \$5,000,000.00, herewith approves the provisions
5 thereof in their entirety, including those relating to the distributive share of plaintiff STEPHANIE
6 ALLISON SCOTT, a minor; and accordingly,

7 IT IS ORDERED, ADJUDGED AND DECREED that said global settlement proceeds be
8 apportioned, distributed and paid to plaintiffs and to their respective counsel of record in
9 accordance with the terms and conditions thereof.

10 DATED: MAR 29 2000

DICKRAN TEVRIZIAN

DICKRAN TEVRIZIAN
JUDGE OF THE UNITED STATES
DISTRICT COURT

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